

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Scott I. Clifford et al. )  
 ) Group Art Unit: 1734  
Serial No.: 10/691,763 )  
 ) Examiner: G. Koch  
Filed: October 23, 2003 )  
 ) Attorney Docket: 132815-7  
For: Modular Painting Apparatus ) (formerly 16129)

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

DECLARATION OF EDWARD J. MINCH UNDER 37 CFR 1.132

Honorable Sir:

Edward J. Minch declares as follows:

1. I received a Bachelor of Science degree in Chemistry in 1984 from Nazareth College at Kalamazoo, Michigan.
2. From 1989 to date, I have been employed by Fanuc Robotics America, Inc., Rochester Hills, Michigan, of the above application. My present position is Account Manager, Paint Systems Automation Group.
3. I have reviewed the declaration document, dated July 17, 2007 of Scott Clifford and Paul Copioli, inventors of the above identified patent application.
4. I can attest to the market impact this machine has had to the industry and in particular to my customer Daimler Chrysler.
5. Daimler Chrysler has purchased P-500 automation for four assembly plants based on the capability of FANUC Robotics to improve total quality, increase throughput, reduce their total material usage and reduce the amount of space required for automation in the assembly plant. Prior to these sales, FANUC Robotics had not sold a total exterior painting system to Daimler Chrysler. Previously, we had provided them with standard 7 axis robots to apply the second coat of basecoat using conventional guns as reciprocators only.

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6. The first DCX sale went to the Windsor Assembly Plant. This is a brand new facility. In a tightly contested competitive bid, FANUC Robotics was able to provide a robotic painting configuration that allowed our construction partner (Eisenmann Corporation) to offer a significantly smaller overall paint shop than their competitors, thus reducing the overall cost of construction and allowing them to win the competitive bid. The system includes 60 P-500 robot arms to paint the exterior of minivans in primer (one zone), basecoat (two zones per line, 3 lines) and clearcoat (two zones per line, 3 lines) at a throughput of 96 jobs per hour to trim. In comparison to the equipment being replaced, the overall quality of the vehicles improved by an average of 25% in measurable appearance data.

7. The second DCX sale went to Mexico for the Saltillo Assembly Plant for exterior clearcoat application to Dodge Ram pick up trucks. In a competitive bid, FANUC Robotics was able to provide DCX with 2 more robots per line (4 total) than our competitor, at a lower price. With the completion of this installation, the measurable quality of the vehicles produced at Saltillo improved by over 20% and the success was featured in an article published in the monthly DaimlerChrysler Mexico News (March 2007). The system features 8 P-500's per line (16 total) for total exterior clearcoat application.

8. The third DCX sale is currently being installed at the St. Louis South Assembly Plant that produces the same minivan as the Windsor Assembly Plant. The success of the Windsor Assembly application drove the upgrade at the existing St. Louis paint shop. The corporation was concerned about producing the same vehicle in two different plants with a significant difference in measurable quality. This sale included 8 P-500 robots per line (16 total) for basecoat and 4 P-500 robots per line (8 total) for the second pass of clearcoat. As their budget did not allow them to purchase new automation for both coats of clearcoat, they opted to install the P-500's as the final coat to gain as much improvement in measurable quality as possible. Funding has been requested to replace the first pass of clearcoat already and the launch of the system will not occur until September, 2007.

9. Our fourth sale was just completed at the end of June. Again, like Windsor, this was a competitive bid for a completely new paint shop. Our construction partner, Giffin, was able to provide for a much smaller foot print for the new building and provide a more competitive price to build the Sterling Heights, Michigan paint shop. This includes two paint lines, each with 6 basecoat and 6 clearcoat P-500 robots (24 total) to produce 86 IPH for the Sebring and Avenger.

10. I further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the above-referenced application or any patent issuing thereon.

Date: July 19, 2007

By

  
EDWARD J. MINCH